

*MEM. END.*

**SAPONE & PETRILLO, LLP**

William S. Petrillo, Esq., Partner  
Edward V. Sapone, Esq., Partner

Chase S. Ruddy, Esq., Senior Associate  
Michael Vitaliano, Esq., Associate

MANHATTAN

1 Penn Plaza, Suite 5315  
New York, New York 10119  
Telephone: (212) 349-9000  
Facsimile: (347) 408-0492  
E-mail: ed@saponepetrillo.com

LONG ISLAND

1103 Stewart Avenue, Suite 200  
Garden City, New York 11530  
Telephone: (516) 678-2800  
Facsimile: (516) 977-1977  
E-mail: william@saponepetrillo.com

BY ECF

March 17, 2020

Hon. Lewis A. Kaplan  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *United States v. Torres*  
Dkt. No.: 18-CR-748

Dear Judge Kaplan:

I am CJA counsel to Defendant Martin Torres in the above-referenced case. Mr. Torres is scheduled for sentencing on March 31, 2020. I write to respectfully request a 30-day adjournment of sentencing.

In addition to the uncertainty posed by COVID-19 and guidance from the government to engage in social distancing, my office is still in the process of obtaining additional documents and information which speak to the factors of 18 U.S.C. §3353(a), and which is necessary for me to complete my sentencing submission and provide Mr. Torres with the effective assistance of counsel at sentencing. For these reasons, I am respectfully requesting an adjournment of Mr. Torres' sentencing hearing to a date in early May, or any date thereafter convenient to the Court.

I have conferred with the government, by AUSA Jessica Greenwood, Esq., who consents to this request.

Your Honor's consideration is greatly appreciated.

Respectfully submitted,

/s/ Edward V. Sapone  
Edward V. Sapone

cc: A.U.S.A. Jessica Greenwood, Esq.  
A.U.S.A. Robert Sobelman, Esq.

*Sentencing adjourned to  
4/28/2020 at 10 a.m.  
LVS  
3/24/2020*